

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	Case No. 08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
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**PROPOSED ORDER GRANTING MOTION OF DR. H.C. TSCHIRA BETEILIGUNGS
GMBH & CO. KG AND KLAUS TSCHIRA STIFTUNG GGMBH TO WITHDRAW
CLAIM NUMBERS 32395 AND 22671 PURSUANT TO RULE 3006 OF THE FEDERAL
RULES OF BANKRUPTCY PROCEDURE**

Upon consideration of the Motion of Dr. H.C. Tschira Beteiligungs GmbH & Co. KG ("KG") and Klaus Tschira Stiftung gGmbH ("KTS" and together with KG, the "Tschira Entities") to withdraw Claim Numbers 32395 and 22671 pursuant to Rule 3006 of the Federal Rules of Bankruptcy Procedure (the "Motion"), and any opposition and reply thereto and the arguments of counsel; and the Court having found that due and proper notice of the Motion has been provided, and it appearing that no further notice need be provided, and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the MOTION is GRANTED; and it is further

ORDERED that the Tschira Entities are hereby authorized to withdraw proofs of claim numbers 32395 and 22671; and it is further

ORDERED that proofs of claim numbers 32395 and 22671 are withdrawn, with prejudice, except as set forth below, effective immediately upon entry of this Order; and it is further

ORDERED that withdrawal of proofs of claim numbers 32395 and 22671 is without prejudice to the Tschira Entities' right to assert any available defenses (including,

without limitation, setoff and/or recoupment) relating to claims that have or may be brought against the Tschira Entities (or any of them); and it is further

ORDERED, that withdrawal of proofs of claim numbers 32395 and 22671 is without prejudice to the Tschira Entities' right to assert any and all claims they may have against any person or entity other than Lehman Brothers Holdings Inc. and its Affiliated Debtors (as defined in footnote 1 to the Order Confirming Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors [Docket # 23023]), including, any and all claims against Lehman Brothers Finance, S.A. Netherlands Antilles Branch.

Dated: _____, 2013
New York, New York

UNITED STATES BANKRUPTCY JUDGE